

**REMARKS**

Claims 1, and 4 – 19 are pending in the application with claim 1 being the independent claim. Claims 1, and 4 – 19 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 7,099,932 (“Frenkel”). Applicants herein amend claims 1, 10, and 11. As a result claims 1, and 4 – 19 are pending. Applicants respectfully request consideration of the rejections in view of the amendments a the following remarks.

***Claim Rejections – 35 U.S.C. § 112***

Claims 10 and 11 stand rejected under 35 U.S.C. § 112, second paragraph for allegedly failing to particularly point out and distinctly claim the subject matter which applicants regard as their own. Without conceding whether claims 10 and 11 are indefinite Applicants have amended claims 10 and 11. Applicants respectfully submit that the rejection is overcome.

***Claim Rejections – 35 U.S.C. § 102(e)***

Applicants respectfully submit that claim 1 as recited patentably defines over Frenkel for at least the following reason. For example, claim 1 recites “an application programming interface that ... is configured to track changes to the data made by the application programs and to register specific application programs for notifications that indicate changes to specific data.” The Examiner stated in an Office Action dated February 7, 2007 that Frenkel discloses notifying application programs that changes have been made to a data store at Frenkel, col. 7, lines 51 – 52 (See, e.g., Office Action dated February 7, 2007 at p. 4), however Applicants have reviewed the referenced section and assert that the above cited portion of Frenkel fails to teach or suggest “an application programming interface that ... is configured to track changes to the data made by the application programs and to register specific application programs for notifications that indicate changes to specific data.”

The cited portion of Frenkel states that a Tree manager can provide consistency control over policy tree objects that store quality of service policy information by tracking the location of any object under a logical parent utilizing an object identifier value. (See, e.g., Frenkel at

col. 7, lines 51 – 52). Applicants submit that “an application programming interface that ... is configured to track changes to the data made by the application programs and to register specific application programs for notifications that indicate changes to specific data” is neither taught or suggested by the above cited portion of Frenkel. The storage platform of claim 1 includes an API that interfaces with the data store that and application programs such as picture viewers, word processors, personal information managers, or any other type of application that is running on an operating system. The API may monitor how the applications are using the data and provide notifications to other applications that are interested in whether the data was changed. Since each and every element of claim 1 is not taught or suggested by Frenkel Applicants submit that claim defines over Frenkel. Accordingly, Applicants request reconsideration of the rejection.

Insomuch as claims 4 – 19 depend directly or indirectly from claim 1 they too patentably define over Frenkel. Accordingly Applicants request reconsideration of their rejections.

## **CONCLUSION**

Applicants request the Examiner reconsider the rejections and issue a Notice of Allowance of all the claims.

Date: May 4, 2007

/David M. Platz/  
David M. Platz  
Registration No. 60,013

Woodcock Washburn LLP  
Cira Centre  
2929 Arch Street, 12th Floor  
Philadelphia, PA 19104-2891  
Telephone: (215) 568-3100  
Facsimile: (215) 568-3439